

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

MICHAEL ADDEN,  
[DOB: 07/23/1997]

Defendant.

Case No. 4:24-00099-01-CR-W-RK

**COUNTS ONE to TEN:**

***Production of Child Pornography***

18 U.S.C. §§ 2251(a) and (e)

NLT: 15 Years Imprisonment

NMT: 30 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: 5 Years to Life

Class B Felony

**COUNT ELEVEN:**

***Attempted Production of Child Pornography***

18 U.S.C. §§ 2251(a) and (e)

NLT: 15 Years Imprisonment

NMT: 30 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: 5 Years to Life

Class B Felony

**COUNTS TWELVE and THIRTEEN:**

***Distribution of Child Pornography***

18 U.S.C. §§ 2252(a)(2) and (b)(1)

NLT: 5 Years Imprisonment

NMT: 20 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: 5 Years to Life

Class C Felony

**COUNT FOURTEEN:**

***Possession of Child Pornography***

18 U.S.C. §§ 2252(a)(4) and (b)(2)

NMT: 20 Years Imprisonment

NMT: \$250,000 Fine

Supervised Release: 5 Years to Life

Class C Felony

\$100 Mandatory Special Assessment  
Each Count

## INDICTMENT

THE GRAND JURY CHARGES THAT:

**COUNTS ONE to TEN**  
**(Production of Child Pornography)**

On or about each of the dates set forth below, said dates being approximate, in the Western District of Missouri and elsewhere, MICHAEL ADDEN, defendant herein, did knowingly employ, use, persuade, induce, entice and coerce a minor, Minor Victim, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was transported in or affecting interstate or foreign commerce, and was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, and attempted to do so:

| COUNT | DATE              | NAME(S) OF VIDEO FILE(S)<br>CONTAINING EACH VISUAL<br>DEPICTION   |
|-------|-------------------|---|
| 1     | November 14, 2023 | 20231114_181545.mp4   |
| 2     | November 20, 2023 | 20231120_154928.mp4   |
| 3     | December 18, 2023 | 20231218_180829.mp4   |
| 4     | December 18, 2023 | 20231218_173144.mp4   |
| 5     | December 21, 2023 | 20231221_145536.mp4   |
| 6     | January 22, 2024  | 20240122_115549.mp4<br>20240122_140850.mp4                        |
| 7     | January 26, 2024  | 20240126_191118.mp4   |
| 8     | January 30, 2024  | 20240130_190019.mp4   |
| 9     | February 6, 2024  | 20240206_091321.mp4<br>20240206_091722.mp4<br>20240206_091934.mp4 |

|    |                  |                     |
|----|------------------|---------------------|
| 10 | February 6, 2024 | 20240206_112920.mp4 |
|----|------------------|---------------------|

all in violation of Title 18, United States Code, Sections 2251(a) and (e).

**COUNT ELEVEN**  
**(Attempted Production of Child Pornography)**

On or about December 26, 2023, the date being approximate, in the Western District of Missouri and elsewhere, MICHAEL ADDEN, defendant herein, did knowingly attempt to employ, use, persuade, induce, entice and coerce a minor, Minor Victim, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit: filename 20231226\_174318.mp4, which visual depiction was transported in or affecting interstate or foreign commerce, and was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce, all in violation of Title 18, United States Code, Sections 2251(a) and (e).

**COUNT TWELVE**  
**(Distribution of Child Pornography)**

On or about March 30, 2024, the date being approximate, in the Western District of Missouri and elsewhere, MICHAEL ADDEN, defendant herein, using any means or facility of interstate or foreign commerce, knowingly distributed a visual depiction that had been shipped and transported in or affecting interstate and foreign commerce by any means including by computer, and the visual depiction contained material which had been shipped and transported in interstate and foreign commerce by any means including by computer; and the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct, and attempted to do so, in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

**COUNT THIRTEEN**  
**(Distribution of Child Pornography)**

On or about April 12, 2024, the date being approximate, in the Western District of Missouri and elsewhere, MICHAEL ADDEN, defendant herein, using any means or facility of interstate or foreign commerce, knowingly distributed a visual depiction that had been shipped and transported in or affecting interstate and foreign commerce by any means including by computer, and the visual depiction contained material which had been shipped and transported in interstate and foreign commerce by any means including by computer; and the production of the visual depiction involved the use of a minor engaging in sexually explicit conduct, and such visual depiction was of such conduct, and attempted to do so, in violation of Title 18, United States Code, Sections 2252(a)(2) and (b)(1).

**COUNT FOURTEEN**  
**(Possession of Child Pornography)**

On or about April 17, 2024, in the Western District of Missouri and elsewhere, MICHAEL ADDEN, defendant herein, knowingly possessed one or more films, videotapes and other matter which contained one or more visual depictions, separate and apart from the visual depictions relied upon in the other numbered Counts, which involved a prepubescent minor and a minor who had not attained 12 years of age, that had been shipped and transported in or affecting interstate commerce, by any means including by computer, and which were produced using materials which had been shipped and transported in interstate and foreign commerce by any means including by computer; and the production of the visual depictions involved the use of minors engaging in

sexually explicit conduct, and were visual depictions of such conduct, all in violation of Title 18, United States Code, Sections 2252(a)(4) and (b)(2).

A TRUE BILL.

05/07/2024

DATE

/s/Kimberley Deardorff

FOREPERSON OF THE GRAND JURY

/s/Kenneth W. Borgnino

Kenneth W. Borgnino  
Assistant United States Attorney  
Special Victims Unit  
Western District of Missouri